

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NATIONAL MORTGAGE
WAREHOUSE, LLC

v.

BANKERS FIRST MORTGAGE CO., *et.al*

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* Case No. CCB-00-CV-2881

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**MOTION OF DIANE BAKLOR FOR ENLARGEMENT OF TIME TO FILE
REPLY IN SUPPORT OF HER MOTION FOR SUMMARY JUDGMENT**

Third-party defendant Diane Baklor, through counsel, Andrew C. White and Susan Q. Amiot, respectfully requests an additional extension of time to file her Reply in support of her Motion for Summary Judgment, and in support of this motion states as follows:

1. On April 8, 2004, after receiving an extension of time by the Court, Defendant and Third-Party Plaintiff Christopher Trikeriotis filed his Response in Opposition to Ms. Baklor's motion for summary judgment. Thereafter, the Court granted a similar extension to counsel for Ms. Baklor to file her Reply -- to May 24, 2004.

2. Counsel for Ms. Baklor now respectfully request an extension to June 18, 2004, to file a Reply. Mr. White has been out of the office in Connecticut for most of the past two weeks, after his father became hospitalized. Mr. White's father passed away this past Tuesday (the 18th) and Mr. White expects to be in Connecticut to handle family matters until approximately Tuesday, May 25, 2004.

3. Undersigned counsel is due to have a baby at the end of next week, and will commence her maternity leave as soon as her child is born.

4. An extension of time until Friday, June 18, 2004 will allow for counsel to prepare a concise and appropriate Reply.

5. Undersigned counsel has contacted Mr. Trikeriotis to determine his position with respect to this extension. Mr. Trikeriotis stated that he does not object to an extension until Friday, June 4, 2004, but objects to any extension after that date.

6. This extension of time will not prejudice the parties or otherwise delay the schedule in this case, as the Court has, at the request of Mr. Trikeriotis, postponed the trial date. A new trial has not yet been set.

WHEREFORE, Diane Baklor respectfully requests that the Court grant this motion, issue the attached proposed Order, and permit her to file her reply in support of her motion for summary judgment on or before Friday, June 18, 2004.

Respectfully submitted,

/S/

Susan Q. Amiot
Law Offices of Andrew C. White, LLC
Suite 2600
201 North Charles Street
Baltimore, MD 21201
410-576-2200,

Counsel For Diane Baklor

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2004, I sent a copy of the foregoing pleading via Electronic Case Filing to all counsel of record, and that I sent a copy by First Class U.S. Mail, postage prepaid, to:

Christopher Trikeriotis
14915 Dunstan Lane
Monkton, MD 21111

/S/

Susan Q. Amiot

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ORDER

Before the Court is Third-Party defendant Diane Baklor's motion for extension of time to file a reply in support of her motion for summary judgment. For good cause shown therein, and having considered the objection of Mr. Trikeriotis, the Court determines that it will GRANT the motion. Accordingly, it is hereby ORDERED that Diane Baklor shall file her reply in support of her motion for summary judgment on or before Friday, June 18, 2004.

CATHERINE C. BLAKE
United States District Judge

Dated: _____, 2004